

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SARA WILSON CELONA
Plaintiff

v.

DAVID J. SCOTT, in his official capacity as
Pepperell Chief of Police
Defendant

Civil Action No: 1:15-CV-11759-DJC

**STATEMENT OF ADDITIONAL MATERIAL FACTS IN SUPPORT OF
DEFENDANT'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT**

Defendant, David J. Scott, Chief of Police in the Town of Pepperell, by his counsel, undersigned, in support of his opposition to the motion for summary judgment herein, submits a separate Statement of Additional Material Facts as to which there is no genuine dispute.

Dated: December 28, 2015

Respectfully Submitted, by the Town Counsel
for the Town of Pepperell and Attorney for
Defendant David Scott

/s/ Edward J. Richardson
Edward J. Richardson, Esq.
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**STATEMENT OF ADDITIONAL MATERIAL FACTS IN SUPPORT OF
DEFENDANT'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT**

Number	Material Fact	Support for Material Fact
1	Massachusetts Chiefs of Police have received guidance relative to possession of marijuana as disqualification for LTC.	Executive Office of Public Safety letter of October 26, 2015 (Attached as Exhibit A)
2.	Plaintiff has renewed her application for LTC and the application fee has been waived	Application dated December 27, 2015 (Attached as Exhibit B)
3.	Plaintiff had a full hearing before a judge of the Ayer District Court Docket No. 1448CV0215 and failed to establish that she was not disqualified under GL c. 140 s. 131(d)(i)(e)	Exhibit D to Complaint

CERTIFICATE OF SERVICE

Edward J. Richardson, undersigned, hereby certifies that the within was served through the ECF system on December 28, 2015.

/s/ Edward J. Richardson
Edward J. Richardson